

JAN 19 2022

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA

U.S. DISTRICT COURT-WVND
MARTINSBURG, WV 25401

UNITED STATES OF AMERICA,

v.

ERICA ROCHELLE BOWMAN,

Defendant.

Criminal No.

3:22-CR- 4

Violations:

18 U.S.C. § 922(a)(6)

18 U.S.C. § 924(a)(2)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(False Statement During Purchase of Firearms)

On or about April 18, 2020, in Hampshire County, in the Northern District of West Virginia, defendant **ERICA ROCHELLE BOWMAN**, in connection with the acquisition of two firearms, that is (1) a German Sports Gun, Model GSG-1911, 22 caliber pistol, bearing serial number A836242 and (2) a Taurus, PT24/7, 9mm pistol, bearing serial number TX649875, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code (referred to as a FFL), knowingly made a false and fictitious written statement to a FFL, which statement was intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearms to defendant **ERICA ROCHELLE BOWMAN** under chapter 44 of Title 18, in that the defendant represented she was the actual purchaser of the firearms, when in fact, she was not the true purchaser of the firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT TWO

(False Statements During Purchase of Firearms)

On or about July 31, 2020, in Hampshire County, in the Northern District of West Virginia, defendant **ERICA ROCHELLE BOWMAN**, in connection with the acquisition of six firearms, that is (1) a Glock GMBH, Model 43X, 9mm pistol bearing serial number BNVD887; (2) a Smith & Wesson, Model M&P M2.0, 9mm pistol, bearing serial number RDS2225; (3) a Taurus, Model G2C, 9mm pistol, bearing serial number ABD476861; (4) a Taurus, Model G2C, 9mm pistol, bearing serial number ABD485134; (5) a Taurus, Model G2S, 9mm pistol, bearing serial number ABC389491; and (6) a Taurus, Model G2S, 9mm pistol, bearing serial number ABC389543, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code (referred to as a FFL), knowingly made a false and fictitious written statement to a FFL, which statement was intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearms to defendant **ERICA ROCHELLE BOWMAN** under chapter 44 of Title 18, in that the defendant represented she was the actual purchaser of the firearms, when in fact, she was not the true purchaser of the firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT THREE

(False Statement During Purchase of a Firearm)

On or about October 9, 2020, in Hampshire County, in the Northern District of West Virginia, defendant **ERICA ROCHELLE BOWMAN**, in connection with the acquisition of a firearm, that is a Smith & Wesson M&P 40 Shield M2.0, 40 caliber pistol, bearing serial number JEZ1609, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code (referred to as a FFL), knowingly made a false and fictitious written statement to a FFL, which statement was intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearm to defendant **ERICA ROCHELLE BOWMAN** under chapter 44 of Title 18, in that the defendant represented she was the actual purchaser of the firearm, when in fact, she was not the true purchaser of the firearm; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

FORFEITURE ALLEGATION

Gun Control Act

Pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d)(1), the government will seek the forfeiture of any firearm and any ammunition involved in or used in any knowing violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2), including (1) a German Sports Gun, Model GSG-1911, 22 caliber pistol, bearing serial number A836242 and (2) a Taurus, PT24/7, 9mm pistol, bearing serial number TX649875; (3) a Glock GMBH, Model 43X, 9mm pistol bearing serial number BNVD887; (4) a Smith & Wesson, Model M&P M2.0, 9mm pistol, bearing serial number RDS2225; (5) a Taurus, Model G2C, 9mm pistol, bearing serial number ABD476861; (6) a Taurus, Model G2C, 9mm pistol, bearing serial number ABD485134; (7) a Taurus, Model G2S, 9mm pistol, bearing serial number ABC389491; and (8) a Taurus, Model G2S, 9mm pistol, bearing serial number ABC389543 and (9) a Smith & Wesson M&P 40 Shield M2.0, 40 caliber pistol, bearing serial number JEZ1609.

A True Bill,

/s/ _____
Grand Jury Foreperson

/s/ _____
WILLIAM J. IHLENFELD, II
United States Attorney

Lara K. Ombs-Botteicher
Assistant United States Attorney